

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT**

I, Justin Niedzwecki, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for criminal complaint as to Jeremy Gordon.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been for approximately 11 years. Currently, I am assigned to the FBI's Resident Agency in Oxford, Mississippi. During this time, I have had extensive training and experience in the investigations of violent crime, gangs, and public corruption. This training and experience includes evidence gathering and interviewing victims, witnesses, and suspects. The information contained in this affidavit is the result of my own investigation and information provided to me by other law enforcement officers. Because it is being submitted for the limited purpose of demonstrating probable cause, this affidavit does not contain all of the information known to me and/or other law enforcement officers involved in this investigation.

3. I am investigating threats of violence transmitted in interstate commerce in violation of Title 18, United States Code, Section 875(c). The statements in this affidavit are based in part on information provided by myself and other law enforcement officials and on my investigation of this matter. Since this affidavit is being submitted for the limited purposes of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that JEREMY GORDON has transmitted a threat of violence against persons in interstate commerce.

## **BACKGROUND AND TECHNICAL TERMS**

4. Based on my training and experience, Your Affiant learned the following about the Internet, Computers, Wireless phones and Facebook:

- a. The Internet is a worldwide network of computer systems operated by governmental entities, corporations, and universities. In order to access the Internet, an individual computer user must subscribe to an access provider, which operates a host computer system with direct access to the Internet. The word-wide web (“www”) is a functionality of the Internet which allows users of the Internet to share information. At a user level pertaining to access to the Internet, a computer may refer to a desktop computer, a laptop computer, a tablet, a smartphone, or any other device used to communicate on the world wide web.
- b. With a computer connected to the Internet, an individual computer user can make electronic contact with millions of computers around the world. This connection can be made by any number of means, including modem, local area network, wireless (WiFi), and numerous other methods.
- c. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.
- d. Facebook owns and operates a free-access internet based social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public. Facebook has servers located outside Mississippi located nationally and internationally.

- e. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

## OFFENSE AND INVESTIGATION

5. Based on my training and experience and what I have learned about the internet and Facebook, there is probable cause to believe that the Facebook posts sent by Jeremy Gordon, knowing that they would be received as threats, and were transmitted in interstate commerce.

6. On September 9, 2022, Greenville Police Department (GPD) received a screenshot from a Facebook post from Jeremy GORDON with the following message:

Y'all can get ready Greenville I'm about to turn into Zeek around this b\*\*\*\* I'm starting at 5:00 pm look out

.....

Y'all got the list ready cuz ik if Zeek can do it I can too this about to be the best killing spree ever [Laughing Emojis]



7. The references to Zeek are related to the recent shooting rampage by Ezekiel Kelly on September 8, 2022 in Memphis, Tennessee. Kelly shot seven people, killing four.
8. Following the post, an unidentified male called GPD from a Voice Over Internet Phone (VoIP) claiming that he was Jeremy GORDON and was in Houston, Texas.
9. FBI sought and received an emergency disclosure request from Facebook. The disclosure provided the following phone numbers associated with the account that posted the threat: XXX-XXX-3577 and XXX-XXX-6057. The Facebook disclosure provided a recovery email address: [jamylagordon6@XXXX.com](mailto:jamylagordon6@XXXX.com).
10. Facebook also identified the IP Address associated with the post. The IP Address belonged to Suddenlink, which has been purchased by Optimum.
11. Optimum identified the IP Address as located at a known address in Greenville, MS, and was subscribed to the defendant's mother. As noted below, the defendant's driver's license lists him as residing at the same identified address.
12. The first number XXX-XXX-6057 was registered to Jeremy GORDON, but is no longer in use.
13. Additionally, an exigent circumstances request to Google revealed that XXX-XXX-3577 was associated with [jamylagordon6@XXXX.com](mailto:jamylagordon6@XXXX.com).
14. Jeremy GORDON's address on his driver's license is as the same identified address in Greenville, Mississippi noted in paragraph 11 above.
15. On September 9, 2022, Jeremy Gordon turned himself in to the Greenville Police Department.


**CONCLUSION**

16. Based on the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the arrest of JEREMY GORDON for violation of Title 18, United States Code, Section 875(c).

Respectfully submitted,

/s/ Justin Niedzwecki  
Special Agent Justin Niedzwecki  
Federal Bureau of Investigation

Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by electronic means on September 9, 2022, 2022.

  
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JUDGE DAVID A. SANDERS  
UNITED STATES MAGISTRATE JUDGE